	Case 2:10-cv-00014-GMN-PAL	Document 108	Filed 05/23/12	Page 1 of 5		
1 2 3 4	SEAN P. DEBRUINE (admitted presean.debruine@alston.com ALSTON & BIRD LLP 275 Middlefield Road, Suite 150 Menlo Park, California 94025 Telephone: 650-838-2000 Facsimile: 650-838-2001	ro hac vice)				
5	ROBERT J. CALDWELL (Bar No	o. 007637)				
6	rcaldwell@klnevada.com MATTHEW J. CHRISTIAN (Bar l					
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9	KOLESAR & LEATHAM, CHTD. 400 South Rampart Boulevard, Suite 400 Las Vegas, Nevada 89145 Telephone: (702) 362-7800					
10						
11	Facsimile: (702) 362-9472					
12	Attorneys for Plaintiff ELAN MICROELECTRONICS CORPORATION					
13	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA					
14						
15		DISTRICT OF I	NEVADA			
16	ELAN MICROELECTRONICS	C	Case No. 2:10-cv-0	0014-GMN-(PAL)		
17	CORPORATION,		LAN MICROEL			
18	Plaintiff,		CORPORATION' INDER SEAL	S MOTION TO FILE		
19	V.					
20	PIXCIR MICROELECTRONICS	CO. LTD.,				
21	Defendant.					
22						
23	Pursuant to Local Rule 10-5(b) and the Court's Protective Order dated September 22, 2011					
24	[Dkt. No. 40], Plaintiff Elan Microelectronics Corporation ("Elan") hereby requests leave of Court					
25	to file under seal the following document, which will be filed contemporaneously herewith:			oraneously herewith:		
26	1. Elan's Motion to Compel Production of Documents and Interrogatory Responses.					
27	2. Exhibit 4 to the Declaration of Sean P. DeBruine in Support of Elan's Motion to			port of Elan's Motion to		
28	Compel Production of Documents and Interrogatory Responses.					
	ELAN'S MOTION TO FILE UNDER SEAL.	1	Ca	ase No. 2:10-cv-00014 GMN-(PA		

Case 2:10-cv-00014-GMN-PAL Document 108 Filed 05/23/12 Page 2 of 5

1	As grounds for this motion, Elan states that Elan's Motion to Compel contains or refers to			
2	information designated by Pixcir as "Confidential" or "Confidential – Attorney Eyes Only"			
3	pursuant to the Stipulated Protective Order in this matter. In addition, Exhibit 4 is designated by			
4	Defendant Pixcir Microelectronics Co. Ltd. as "Highly Confidential – Attorney Eyes Only"			
5	pursuant to the Stipulated Protective Order in this matter.			
6	Pursuant to Local Rule 10-5(b), Elan will file the above-referenced papers under seal with			
7	the requisite notation: "FILED UNDER SEAL PURSUANT TO COURT ORDER DATED			
8	SEPTEMBER 22, 2011."			
9	DATED: May 21, 2012 Respectfully submitted,			
10				
11				
12	By: /s/Sean P. DeBruine			
13	Robert J. Caldwell, Esq. (Nevada Bar No. 7637) Matthew J. Christian, Esq. (Nevada Bar No. 8024)			
14	KOLESAR & LEATHAM, CHTD. 400 South Rampart Boulevard, Suite 400			
15	Las Vegas, Nevada 89145			
16	and			
17	Sean P. DeBruine, Esq. Admitted <i>Pro Hac Vice</i>			
18	ALSTON & BIRD LLP 275 Middlefield Road, Suite 150			
19	Menlo Park, California 94025			
20	Attorneys for Plaintiff ELAN MICROELECTRONICS CORPORATION			
21				
22				
23	IT IS SO ORDERED this 23rd day of May, 2012.			
24	day of May, 2012.			
25	Jeggy a. Feen			
26	Peggy A Leen United States Magistrate Judge			
27				
28				

	II .					
1	CERTIFICATE OF SERVICE					
2	I hereby certify that I am an Employee of Alston & Bird LLP, and that on the 21st day of					
3	May, 2012, I served a true and correct copy of foregoing					
4	ELAN MICROELECTRONICS CORPORATION'S MOTION TO FILE UNDER					
5	SEAL; and	ord order on a morion to file onder				
6						
7	[PROPOSED] ORDER GRANTING ELAN MICROELECTRONICS					
8	CORPORATION'S MOTION TO FILE U	INDER SEAL				
9	via (ELECTRONIC SERVICE) Pursuant to FRCP 5(b)(3) and LR 5-4, the above-					
10	referenced document was electronically filed and served upon the parties listed below through the					
11	Court's Case Management and Electronic Case Filing (CM/ECF) system:					
12	Robert E. Krebs, Esq. Ronald F. Lopez, Esq.	Kenneth D'Alessandro, Esq. W. West Allen, Esq.				
13	Christopher L. Ogden, Esq. Nixon Peabody LLP	Lewis and Roca, LLP 3993 Howard Hughes Parkway				
14	2 Palo Alto Square, 3000 El Camino Real, Suite 500	Suite 600 Las Vegas, Nevada 89169				
15	Palo Alto, California 94306-2106					
16	Facsimile: (650) 320-7701	Facsimile: (702) 949-8365				
17	Email: rkrebs@nixonpeabody.com	Email: kdalessandro@lrlaw.com				
18	rflopez@nixonpeabody.com	wallen@lrlaw.com				
19	cogden@nixonpeabody.com	Attorneys for Defendant, Pixcir Microelectronics Corporation				
20	Attorneys for Defendant, Pixcir Microelectronics Corporation					
		16 -16				
21		7.10-111.				
22		Employee, Alston & Bird LLP				
23		Employee, Indicate Blid EEI				
24						
25						
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1 2	SEAN P. DEBRUINE (admitted <i>pro hac vice</i>) sean.debruine@alston.com ALSTON & BIRD LLP					
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11	Facsimile: (702) 362-9472					
12	Attorneys for Plaintiff ELAN MICROELECTRONICS CORPORATIO	N				
13						
14	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA					
15	DISTRICT	JF NEVADA				
16	ELAN MICROELECTRONICS	Case No. 2:10-cv-00014-GMN-(PAL)				
17	CORPORATION,	[PROPOSED] ORDER GRANTING				
18	Plaintiff,	ELAN MICROELECTRONICS CORPORATION'S MOTION TO FILE				
19	V.	UNDER SEAL				
20	PIXCIR MICROELECTRONICS CO. LTD.,					
21	Defendant.					
22		_				
23						
24						
25						
26						
27						
28						
	[PROPOSED] ORDER GRANTING ELAN'S MOTION TO SEAL	Case No. 2:10-cv-00014 GMN-(PAI				

Case 2:10-cv-00014-GMN-PAL Document 108 Filed 05/23/12 Page 5 of 5 The Court has received plaintiff Elan Microelectronics Corporation's Motion to File Under 1 2 Seal, filed on May 21, 2012. Good cause appearing, Elan's motion is hereby GRANTED. It is 3 hereby ORDERED that the following document may be filed under seal: 1. Elan's Motion to Compel Production of Documents and Interrogatory Responses. 4 2. Exhibit 4 to the Declaration of Sean P. DeBruine in Support of Elan 5 Microelectronics Corporation's Motion to Compel Production of Documents and Interrogatory 6 Responses. 7 8 **IT IS SO ORDERED** this _____ day of _______, 2012. 9 10 11 The Honorable Peggy A. Leen 12 United States Magistrate Judge 13 Respectfully submitted, 14 15 16 17 By: /s/ Sean P. DeBruine Robert J. Caldwell, Esq. 18 Nevada Bar No. 7637 **KOLESAR & LEATHAM, CHTD.** 19 Matthew J. Christian, Esq. Nevada Bar No. 8024 20 400 South Rampart Boulevard, Suite 400 Las Vegas, Nevada 89145 21 and 22 Sean P. DeBruine, Esq. 23 Admitted Pro Hac Vice ALSTON & BIRD, LLP 24 275 Middlefield Road, Suite 150 Menlo Park, California 94025 25 Attorneys for Plaintiff 26 ELAN MICROELECTRONICS CORPORATION 27 28 [PROPOSED] ORDER GRANTING Case No. 2:10-cv-00014 GMN-(PAL) 2

ELAN'S MOTION TO SEAL